June 4, 2004

Ex Parte Letter

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: MB Docket 03-15, Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television

Dear Ms. Dortch:

The undersigned 32 organizations, including television broadcasters, a television network, a television broadcast trade association, broadcast equipment manufacturers, and a broadcast technical consultant, hereby jointly urge the Commission to authorize quickly use of Distributed Transmission techniques in Digital Television (DTV) broadcast operations. The Notice of Proposed Rulemaking in the Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, MB Docket No. 03-15, sought comments on the potential authorization of Distributed Transmission techniques (also called Single Frequency Networks). It is our understanding that the Commission will shortly address at least some portion of the matters raised in the NPRM by issuing a Report and Order. We respectfully request that Distributed Transmission be authorized in that Report and Order.

Distributed Transmission is a technique that uses multiple transmitters sharing a channel to deliver a single digital television signal to consumers. It takes advantage of an element of all digital television receivers – the adaptive equalizer – to treat the signals from alternate transmitters as echoes of one another, which are then cancelled or combined in the adaptive equalizer. The advantages of this method are that (1) more uniform and higher level signals can be distributed over a wider area while causing less interference to neighboring operations, (2) gaps in coverage caused by terrain can be filled in, and (3) a variety of natural and man-made phenomena that inhibit reception of DTV signals in numerous situations can be overcome. Distributed Transmission also can enhance the likelihood of set top reception of DTV signals, potentially can help make possible DTV

reception in pedestrian and mobile applications, and in general can reach audiences more effectively and reliably, while using spectrum more efficiently because of the reduced interference caused outside service areas compared to more powerful transmitters on tall towers.

The Advanced Television Systems Committee (ATSC) has developed a standard to document the techniques necessary to synchronize transmitters, as must be done in Distributed Transmission systems. This standard essentially has been unchanged over the past year during implementation and testing, one of the normal phases in the ATSC standard setting process, and recently has been republished with improvements supporting additional applications of Distributed Transmission systems in preparation for the final approval process. The ATSC is also writing a Recommended Practice to provide additional information to aide in the implementation of such systems. Adoption of the ATSC Distributed Transmission standard and the Recommended Practice is expected sometime this summer.

The first multiple transmitter system has been built based upon the ATSC transmitter synchronization standard, using an Experimental License granted by the Commission.[1] That system has clearly demonstrated that the transmitter synchronization technique does indeed work and that it is possible to significantly improve the coverage of a digital television station in areas that it could otherwise not serve. The time now has come for the Commission to authorize wide implementation of the technique, which promises significant improvements to digital television broadcasting operations. Several of the broadcast groups listed below are very interested in deploying Distributed Transmission systems in a number of markets.

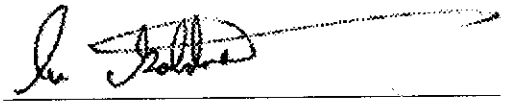
We understand that a proposal has been submitted to the Commission that would authorize the use of Distributed Transmission systems consistent with the Commission's existing rules, including the so-called "2 percent/10 percent" *de minimis* rules. Given the assurance

[1] WPSX-DT, Clearfield, PA, Channel 15, File No. BPEDT20000501AHR, and Experimental License with no call sign, State College, PA, Channel 15, File No. BEXP20010608ABD, both licensed to The Pennsylvania State University.

that no excess interference will be caused by Distributed Transmission systems, the undersigned urge the Commission to authorize use of the technology as quickly as possible.

Distributed Transmission technology holds great promise to enable broadcasters to use their assigned channels more efficiently while improving service to the public. Because the Commission can modify its rules to enable broadcasters to pursue these benefits while ensuring that no additional interference will be created beyond what its rules already allow, the undersigned organizations submit that the authorization of Distributed Transmission technology is decidedly in the public interest and respectfully request that the Commission authorize the routine licensing of Distributed Transmission systems in its forthcoming Report and Order.

Respectfully submitted,



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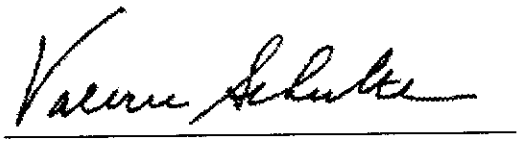

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